

Ira Spiro (sued as Robert Ira Spiro)
10573 West Pico Blvd. #865
Los Angeles, CA 90064
Telephone: 310-235-2350
e-mail: ira@spirolawcorp.com

Defendant in Propria Persona

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

TODD R.G. HILL,

Plaintiff,

vs.

THE BOARD OF DIRECTORS,
OFFICERS AND AGENTS AND
INDIVIDUALS OF THE PEOPLES
COLLEGE OF LAW ET AL.,

Defendants.

Case No. CV23-1298-JLS(PDx)

**EXHIBITS FOR DEFENDANT
SPIRO'S REPLY IN SUPPORT OF
MOTION UNDER F.R.C.P. 41(b)
AND 12(b)(6) TO DISMISS WITH
PREJUDICE PLAINTIFF'S THIRD
AMENDED COMPLAINT (Dkt. No.
49) AND THE ENTIRE ACTION**

Before
Hon. Josephine L. Staton and
Hon. Magistrate Judge
Brianna Fuller Mircheff

DECLARATION OF DEFENDANT IRA SPIRO

1. I am a defendant in this case.

2. Yesterday, October 9, 2024, I filed my reply in support of my motion to dismiss plaintiff's Third Amended Complaint. But I mistakenly failed to include in the reply its two exhibits. They are very short, a total of four pages. I am now filing them with this declaration.

3. Attached as Exhibit A is the email I received from the Court's ECF system, serving me with the Third Amended Complaint. It shows at the top that the email was sent August 26, 2024 at 3:45 p.m.

4. Attached as Exhibit B is the State Bar's emailed letter to me, dated September 15, 2022, confirming that a plan submitted by Peoples College of Law and me for Plaintiff's fourth year of study at Peoples College of Law, if successfully completed by Plaintiff, would "fulfill the requirement of Rule 4.26 of the [State Bar] Admissions Rules and thereby establish [Plaintiff's] eligibility to take the California Bar Examination."

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

October 10, 2024

_____/s/_____
Ira Spiro

EXHIBIT A

From: cacd_ecfmail@cacd.uscourts.gov <cacd_ecfmail@cacd.uscourts.gov>

Sent: Monday, August 26, 2024 3:45 PM

To: ecfnef@cacd.uscourts.gov

Subject: Activity in Case 2:23-cv-01298-JLS-BFM Todd R.G. Hill et al v. The Board of Directors, Officers and Agents and Individuals of the Peoples College of Law et al Amended Complaint

This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended.

*****NOTE TO PUBLIC ACCESS USERS***** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30 page limit do not apply.

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

Notice of Electronic Filing

The following transaction was entered on 8/26/2024 at 3:44 PM PDT and filed on 8/21/2024

Case Name: Todd R.G. Hill et al v. The Board of Directors, Officers and Agents and Individuals of the Peoples College of Law et al

Case Number: [2:23-cv-01298-JLS-BFM](#)

Filer: Todd R. G. Hill

**Document
Number:** [148](#)

Docket Text:

THIRD AMENDED COMPLAINT against Defendants Roger Aramayo, Louisa Ayrapetyan, David Tyler Bouffard, George S. Cardona, Hailyn Chen, Audrey Ching, Ellin Davytyan, Carol Dupree, Ruben Duran, Clemente Franco, Joshua Gillens, Robert Ira Spiro, Paul A. Kramer, Jean Krisilnikoff, Natalie Leonard, William Maestas, Christina Marin Gonzalez, Devan McFarland, Hector C. Pena, Edith Pomposo, Hector Sanchez, Prem Sarin, Juan Manuel Sarinana, Melanie M

Shelby, Gary Silbiger, Arnold Sowell, Jr, Brandon N. Stallings, The Board of Directors, Officers and Agents and Individuals of the Peoples College of Law, The Guild Law School, Mark W. Toney, Pascual Torres, Ismael Venegas, Leah Wilson, Enrique Zuniga, Adriana Zuniga Nunez; Party Mark Broughton (Supreme Court Appointee, Attorney Member), Tammy Campbell (Program Manager II, Operations and Management), Jose Cisneros (Governor Appointee, Public Member), Gina Crawford, Lisa Cummins (Principal Program Analyst, Examinations), Juan De La Cruz, Jay Frykberg, Anthony J Garcia (Assistant Chief Trial Counsel), Suzanne Celia Grandt (Esq), James Herman, Alfredo Hernandez, Donna Hershkowitz, Caroline Holmes, Vanessa Holton (Esq), Elizabeth Hom, Natalie Hope, Larry Kaplan, Gregory E. Knoll (Senate Appointee, Attorney Member), Melanie J. Lawrence (Interim Chief Trial Counsel), Steve Mazer, Eli D. Morgenstern (Senior Trial Counsel), Amy Nunez (Director III), Carmen Nunez, Joan Randolph, Imelda Santiago, Shataka Shores-Brooks, The Board of Trustees the State Bar of California as Agents and Individuals, The Office of Admissions The State Bar of California as Staff Agents and Individuals, The Office of Chief Trial Counsel The State Bar of California as Agents and Individuals, The Sovereign State of California (Nominal Defendant), Jessica Viramontes (Esq), Kim Wong (Admissions), Yun Xiang, Attorney General of the United Staes (Nominal Defendant) and Robert S. Brody terminated amending Second Amended Complaint, [55], filed by Plaintiff Todd R. G. Hill (es)

2:23-cv-01298-JLS-BFM Notice has been electronically mailed to:

Jean Roche Krasilnikoff Jean.Krasilnikoff@calbar.ca.gov, jenny.batdorj@calbar.ca.gov

Jeffrey Kirwin jkirwin@hbblaw.com, cmulder@hbblaw.com, edocs@hbblaw.com

Jennifer E Ko jennifer.ko@calbar.ca.gov, jenny.batdorj@calbar.ca.gov

Robert Ira Spiro ira@spirolawcorp.com

Todd R. G. Hill toddryangregoryhill@gmail.com

Yvette Davis ydavis@hbblaw.com, edocs@hbblaw.com, jaraujo@hbblaw.com

2:23-cv-01298-JLS-BFM Notice has been delivered by First Class U. S. Mail or by other means BY THE FILER to :

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:C:\fakepath\LA23CV1298BFM-ThirdAmmendedComplaint.pdf

Electronic document Stamp:

[STAMP cacdStamp_ID=1020290914 [Date=8/26/2024] [FileNumber=38535312-0
][5102d9fe42b3e9e5ca7bcef16a87d01348f851a044958f0b6798e2b43d91bd3a7c1
a95961a35c57e7bfd335044f4c025abe316a2392516d6bf528eef650118e6]]

EXHIBIT B

From: State Bar of California - Eligibility <eligibility@calbar.ca.gov>

Sent: Thursday, September 15, 2022 12:36 PM

To: Ira Spiro <ira@spirolawcorp.com>

Cc: toddryangregoryhill@gmail.com; administrator@peoplescollegeoflaw.edu; hectorpena@ucla.edu; dean@peoplescollegeoflaw.com

Subject: Results for Evaluation of Law Study Contemplated [ref:_00Dt0TZax._500t012TKU3:ref]



The State Bar
of California

OFFICE OF ADMISSIONS

File #: 498729

Dear Ira Spiro,

This will confirm that upon successful completion of the proposed plan of study you submitted on behalf of Mr. Todd Hill for the study period indicated from 9/6/2022 to 5/19/2023, he will fulfill the requirement of Rule 4.26 of the **Admissions Rules** and thereby establish eligibility to take the California Bar Examination.

Please note that Mr. Hill previously received credit for Real Property I and II and not Property I and II as indicated on the proposed plan. In any case, this scenario will still qualify him to take the examination. According to the proposed plan of study received, Mr. Hill will have completed 405 hours of law study during the time period indicated above, satisfying the 270 hours time requirement in accordance with **Rules**.

Sincerely,

Nathalie Hope
Program Specialist
Office of Admissions

State Bar of California

(213) 765-1547

ref:_00Dt0TZax._500t012TKU3:ref

PROOF OF SERVICE**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

I reside in the State of California, County of Los Angeles. My business address is 10573 West Pico Blvd. #865, Los Angeles, CA 90064.

On October 10, 2024, I served the document described as **EXHIBITS FOR DEFENDANT SPIRO'S REPLY IN SUPPORT OF MOTION UNDER F.R.C.P. 41(b) AND 12(b)(6) TO DISMISS WITH PREJUDICE PLAINTIFF'S THIRD AMENDED COMPLAINT (Dkt. No. 49) AND THE ENTIRE ACTION** on the interested parties in this action by placing: [] the original [xx] true copies thereof enclosed in sealed envelopes, addressed as follows to interested parties as follows (or as stated on the attached service list):

Todd R. G. Hill
41459 Almond Avenue
Quartz Hill, Ca 93551

[X] **BY MAIL:** I deposited the envelope(s), with postage prepaid, in the United States Mail (United States Postal Service) at Los Angeles, California.

[] **BY MAIL PER BUSINESS PRACTICES:** I placed the document(s) in a sealed envelope for collection and mailing following ordinary business practices. I am readily familiar with this business' practice for collection and processing of correspondence for mailing with the U.S. Postal Service. Under that practice, the envelopes are deposited with the U.S. Postal Service that same day in the ordinary course of business with postage thereon fully prepaid at Los Angeles, California.

[] **BY ELECTRONIC TRANSMISSION:** On the date set forth below I caused to be transmitted the document(s) listed above on the parties listed herein at their most recent known e-mail address(s) or e-mail of record in this action before 6:00 p.m. I hereby certify that this document was served from Los Angeles, California.

[] **BY PERSONAL SERVICE:** I delivered the document, enclosed in a sealed envelope, by hand to the offices of the addressee(s) named herein.

[] **BY OVERNIGHT DELIVERY:** I am "readily familiar" with this firm's practice of collection and processing correspondence for overnight delivery. Under that practice, overnight packages are enclosed in a sealed envelope with a packing slip attached thereto fully prepaid. The packages are picked up by the carrier at our offices or delivered by our office to a designated collection site.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed October 10, 2024 at Los Angeles, California.

Ira Spiro
Type or Print Name

/s/

Signature